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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CASE NO. CR-15-00205 WHA
)	
v.)	
)	
JAQUAN DESHAWN TAYLOR,)	STIPULATION AND PROPOSED ORDER
)	
Defendant.)	
)	
)	
)	

The Government, by and through its attorney, Laurie Kloster Gray, and defendant, by and through his attorney, Geoffrey A. Hansen, respectfully submit this Stipulation and Proposed Order to memorialize the exclusion of time under the Speedy Trial Act from August 11, 2015, until the next appearance on September 29, 2015, at 2:00 p.m. The parties are drafting stipulations to present to the court for a stipulated facts bench trial on September 29, 2015. Government counsel will be out of the country from August 28, 2015 until September 10, 2015. For these reasons, the parties hereby stipulate and agree that the time from August 11, 2015, through and including September 29, 2015, be excluded from the Speedy Trial Act computation pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) to allow for effective

1 preparation and continuity of counsel.

2 IT SO STIPULATED.

3 DATED: August 11, 2015

MELINDA HAAG
United States Attorney

5 By: /s/
LAURIE KLOSTER GRAY
Assistant United States Attorney

7 DATED: August 11, 2015

/s/
GEOFFREY A. HANSEN
Assistant Federal Public Defender
Counsel for Jaquan Deshawn Taylor

10 **~~PROPOSED~~ ORDER**

12 THE COURT FINDS that the time period from August 11, 2015, through and including
13 September 29, 2015, the date of the parties' next appearance, shall be excluded from the otherwise
14 applicable Speedy Trial Act computation for effective preparation and for continuity of counsel.

15 THE COURT FINDS THAT the ends of justice served by granting a continuance from August
16 11, 2015, through and including September 29, 2015, outweigh the best interest of the public and the
17 defendant in a speedy trial within the meaning of 18 U.S.C. § 3161(h)(7)(A).

18 Accordingly, THE COURT ORDERS THAT the period from August 11, 2015, through and
19 including September 29, 2015, is excluded from the otherwise applicable Speedy Trial Act computation,
20 pursuant to 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

22 IT IS SO ORDERED

23 DATED: August 12, 2015

24 
HON. WILLIAM H. ALSUP
United States District Judge